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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 CHARLES ASBERGER,)
13 Plaintiff,) Case No. 2:14-cv-01209-RFB-PAL

14 v.)

15 CAROLYN W. COLVIN,)
16 Acting Commissioner of Social Security,)

17 Defendant.)

18)
19 **UNOPPOSED MOTION FOR**
20 **EXTENSION OF TIME**
21 **(SECOND REQUEST)**

22 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
23 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm by
24 30 days from April 1, 2015, to and including May 1, 2015.

25 Defendant respectfully requests this extension due to a heavy workload, including several other
26 district court cases, despite due diligence, and because Defendant was out of the office for several days.
Defendant therefore needs additional time to prepare a response in this matter and properly address the

1 issues Plaintiff raises in his motion. This request is made in good faith with no intention to unduly delay
2 the proceedings. This is Defendant's second request for an extension.

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4 On April 1, 2015, Counsel for Defendant conferred with Plaintiff's counsel who had no objection
5 to this motion.

6 Defendant sincerely apologizes to the Court for any inconvenience caused by this delay.

7 Respectfully submitted this 1st day of April 2015.

8 DANIEL G. BOGDEN
9 United States Attorney

10 /s/ Lynn M. Harada
11 LYNN M. HARADA
12 Special Assistant United States Attorney

13 OF COUNSEL:

14 DONNA L. CALVERT
15 Regional Chief Counsel, Region IX

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17 IT IS SO ORDERED:

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: April 7, 2015

CERTIFICATE OF SERVICE

I, LYNN M. HARADA, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME (SECOND REQUEST)** on the date and via the method of service identified below:

CM/ECF:

Marc V. Kalagian
Rohlfing & Kalagian, LLP
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Dated this 1st day of April 2015.

/s/ Lynn M. Harada
LYNN M. HARADA
Special Assistant United States Attorney